



Reply to
Attn of: WD-133

October 26, 1995

Susan K. Smith
R.H. Smith Distributing Co., Inc.
P.O. Box 6
Grandview, Washington 98930

Re: **Field Notice of Non-Compliance #010**
Smitty's Conoco, #4-260087
Toppenish, Yakama Indian Reservation

Dear Ms. Smith:

Thank you very much for the compliance verification material you recently submitted in response to the above notice.

After reviewing the material, my comments on this documentation are as follows:

1. The inventory control monthly summary sheets are not complete in terms of the necessary detail to show:
 - a. how the daily over/shorts are calculated, i.e. listing the daily book inventory vs. the stick inventory figures;
 - b. the sum of the monthly throughput of each tank;
 - c. a reconciliation of the monthly throughput volume and the cumulative over/shorts of the month, and a resulting conclusion that the tank is or is not suspected of leaking; and
 - d. the date and result of the monthly water level check for each tank.

Also, more than half of the delivery volumes are entered in multiples of 100 gallons leading to the observation that before and after stick/volume readings are probably not always being done to determine the exact volume delivered. This is required as an important part of the inventory control method for tank release detection, per federal regulation 40 CFR §280.43 (a) (3), copy enclosed. I left a copy of EPA publication "Doing Inventory Control Right" with the station manager at the conclusion of my inspection, and another copy is enclosed for your reference. I strongly suggest that you review it also, especially if you have any questions about the above comments and EPA's expectations for acceptable inventory control documentation.

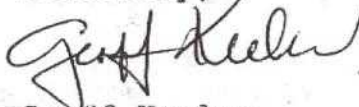
2. The tank volume tables are fine. However, after comparing a number of the daily stick readings from your September records with the respective tables, I find that a number of the daily volume entries on your monthly inventory control sheets do not match tank volume figures shown on the tables. This seems to be pronounced with the 4,000-gallon tank containing super unleaded gasoline. Unless your stick reader frequently interpolates between 1/8-inch marks on the inventory stick and corresponding 1/8-inch volume table entries, it leads one to conclude that not all volumes entered are from the volume tables that have been submitted.

3. The drop tube length verifications are acceptable.

In conclusion, please provide me with your comments and/or explanations regarding items 1 and 2 discussed above. If you have additional documentation that help to complete the necessary information in the monthly inventory control summary sheets (i.e. showing missing information in items 1 a-d above) please forward copies of it. Failing this, and after reviewing the "Doing Inventory Control Right" brochure, please initiate corrected procedures immediately and submit copies of the monthly inventory control summary/reconciliation sheets for these tanks for the month of November 1995. These will be due not later than December 11, 1995.

If you have any questions or comments, I can be reached at (206) 553-1089, or toll-free at (800) 424-4372, extension 1089.

Sincerely,



Geoff Keeler
Compliance Officer

enclosures (2)

cc: Jannine Jennings, Yakama Indian Nation